

## REMARKS

In the Office Action, Claims 10-14 and 16-23 were withdrawn from further consideration as being drawn to a nonelected invention and species, there being no allowable generic or linking claim. Also, Claims 1-9 and 15 were rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Linkletter (U.S. Pat. No. 4,087,319) as evidenced by Schmitt et al. (U.S. Pat. No. 4,036,684), or Kankaanpää et al. (U.S. Pat. No. 4,059,482), or Hill (U.S. Pat. No. 3,855,057), or Cole et al. (U.S. Pat. No. 3,432,936); and Claims 1-3, 9 and 15 were rejected under 35 U.S.C. §102(b) as allegedly anticipated by or in the alternative under 35 U.S.C. §103(a) as allegedly obvious over Wedel (U.S. Pat. No. 5,037,509).

In the previous Office Action, Claim 15 was held by the Office to be “generic to species a) through c)” corresponding respectively to Claims 1-9; Claims 19-21; and Claims 22-23. See 3/9/04 Office Action, page 2, paragraph no. 4 to page 3, 1<sup>st</sup> paragraph. Thus, Applicants respectfully request re-entry and examination of Claims 10-14 and Claims 19-21 should generic Claim 15 be allowed for the reasons discussed below.

Applicants respectfully traverse the rejection of Claims 1-9 and 15 under 35 U.S.C. §103(a) as being unpatentable over Linkletter. For example, Claim 1 recites a system for transferring a continuously advancing paper web from a dryer to a reel section comprising a first fabric defining a first moving conveyor, the first fabric being positioned downstream from the dryer; a second fabric defining a second moving conveyor, the first moving conveyor overlapping the second moving conveyor for a predetermined distance, the first and second moving conveyors being configured to receive the paper web between the conveyors; and a vacuum device rotatably disposed against the first moving conveyor, the dryer and the vacuum device disposed relative to each other to form an open draw therebetween, the vacuum device

configured to produce a suction to attract the web to the first fabric for transferring the advancing web into the predetermined distance where the first and second conveyors overlap. Applicants respectfully submit that the cited combination does not disclose each and every element of Claim 1.

Linkletter is generally directed to guiding a leading end of a web W from a Yankee dryer roll 7 across a narrow gap between the roll 7 and a receiving end of a transporting run 13 of a conveyor belt 14 by means of an air threading shower projected from an orificed manifold 22 located adjacently below the gap. See col. 2, ll. 58-67 of Linkletter. In contrast to Claim 1, Figure 1 of the cited reference shows the web W being blown upward against gravity with no vacuum used to suction the web across the gap. The Office Action also concedes that Linkletter is silent with regard to using a vacuum to transfer a sheet to a first transfer fabric.

The Office Action relies on Schmitt et al., Kankaanpää et al., Hill, or Cole et al. to remedy the deficiencies of Linkletter. However, Applicants respectfully submit that such reliance is misplaced.

Schmitt et al., for instance, teaches that a web is never passed across an open gap as it travels through the paper-making machine. See col. 1, ll. 61-64 of Schmitt et al. Although the cited reference discusses a vacuum, Schmitt et al. employs an entirely different form of vacuum to physically hold the web on the fabric “for its entire travel through the papermaking machine” and teaches that any situation requiring the web to support itself should be avoided. See col. 3, ll. 49-68. Thus, Applicants respectfully submit that one skilled in the art would not have looked to nor have found motivation in Schmitt et al. to cure Linkletter. Moreover, Applicants respectfully submit that significantly altering the Schmitt et al. vacuum to remedy the

deficiencies of Linkletter would require impermissible hindsight afforded by the present invention of Claim 1.

Kankaanpää et al. is similar to Schmitt et al. and likewise fails to cure the deficiencies of Linkletter. In Kankaanpää et al., “the web is continuously supported without any open draw, the web being supported at least through three successive press nips beyond the wire while engaging at all times either a felt or a roll, with dewatering of the paper web taking place as it travels through the pickup and press section.” Col. 1, ll. 12-17. So like Schmitt et al., the vacuum disclosed in Kankaanpää et al. is for continuously supporting the web. Applicants respectfully submit that one skilled in the art would not have looked to nor have found motivation in Kankaanpää et al. to cure Linkletter.

Hill also does not cure Linkletter. As shown in Figure 1 of Hill, a web W is continuously supported in a paper making machine. The suction role 15, for example, as shown and described in Hill is for dewatering and does not remedy the deficiencies of Linkletter. See, e.g., col. 10, ll. 2-15. Thus, Applicants respectfully submit that one skilled in the art would not have looked to nor have found motivation in Hill to cure Linkletter.

Cole, too, fails to remedy the deficiencies of Linkletter. Although Cole discloses a vacuum duct 54, this vacuum 54 is for moisture removal. See col. 12, ll. 6-13. Thus, Applicants respectfully submit that one skilled in the art would not have looked to nor have found motivation in Cole to cure Linkletter.

Applicants respectfully submit that the cited references fail to disclose each and every element of Claim 1, alone or in any combination. Therefore, Applicants respectfully submit that Claim 1 is patentable over the cited references and respectfully request that the rejection be withdrawn. Applicants further respectfully request allowance of Claim 1 and its dependent

Claims 2-9. Also, Applicants respectfully submit that Claim 15 is patentable over the cited references for essentially the reasons discussed above and respectfully request that the rejection to Claim 15 be removed and its allowance indicated.

Applicants respectfully traverse the rejection of Claims 1-3, 9 and 15 in view of Wedel. For example, Claim 1 recites in part a vacuum device rotatably disposed against the first moving conveyor, the dryer and the vacuum device disposed relative to each other to form an open draw therebetween, the vacuum device configured to produce a suction to attract the web to the first fabric for transferring the advancing web into the predetermined distance where the first and second conveyors overlap. Applicants respectfully submit that Wedel does not disclose each and every element of Claim 1.

As shown in Figures 1-4, Wedel discloses a tail transfer apparatus 10 for threading a tail 24 of a web W while there is no draw D between a press roll 16 and a lead-in roll 26 (see, e.g., Fig. 1). The cited reference subsequently forms the draw D after the tail 24 is threaded (i.e., once the web W has been transferred past the lead-in roll 26 to a dryer cylinder 52 in order to widen the web W to “full width” (see, e.g., Figs. 4-9). Although Wedel describes a suction tail box 30 connected to a partial vacuum 32, this form of vacuum is only for moving the tail 24 from the press roll 16 onto the moving drying felt 28 before the draw D is formed by moving the lead-in roll 26 via means 34; i.e., the partial vacuum 32 does not produce a suction to attract the web W across the subsequently formed draw D. See, e.g., col. 7, ll. 62-67 and col. 9, ll. 18-24. Thus, Applicants respectfully submit that Wedel is completely different from and fails to anticipate Claim 1.

Moreover, Applicants respectfully submit that one skilled in the art would not have been motivated to completely alter the components of Wedel as they are suited for their intended

purpose, such as by making the movable lead-in roll 26 a stationary device and altering the partial vacuum 32, which the cited reference expressly seeks to avoid. See col. 10, ll. 11-17.

Therefore, Applicants respectfully submit that Wedel does not render Claim 1 obvious, and Applicants respectfully request the withdrawal of the rejection of Claim 1, its allowance and the allowance of its dependent Claims 2-9.

For essentially the same reasons given with respect to Claim 1 above, Applicants respectfully request that the Examiner withdraw the rejection to Claim 15 and indicate its allowance. Also as noted above, Applicants respectfully request that if Claim 15 is indicated as allowable that the Examiner reenter and reconsider Claims 10-14 and 16-23.

In view of the foregoing discussion, Applicants respectfully submit that Claims 1-9 and 15 are allowable over the cited references and that the application is in condition for allowance.

The Examiner is encouraged to contact the undersigned at his convenience should he have any questions regarding this matter, or to resolve any remaining issues.

Please charge any fees required this Request for Reconsideration to Deposit Account No. 04-1403.

Respectfully submitted,

DORITY & MANNING,  
ATTORNEYS AT LAW, P.A.



Bernard S. Klosowski, Jr.  
Registration No. 47,710

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Date

Post Office Box 1449  
Greenville, SC 29602-1449  
Telephone: 864-271-1592  
Facsimile: 864-233-7342